

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)

UNITED STATES OF AMERICA *

vs. * CASE NO. RB 14-0186

RICHARD DRUMMOND *

MOTION TO SUPPRESS EVIDENCE

The Defendant, by and through his attorney, Robert C. Bonsib, Esquire, respectfully requests this Honorable Court to suppress evidence seized in the above captioned matter and as reasons there states as follows:

1. That the Defendant has been indicted in the above captioned case for conspiracy to distribute controlled dangerous substances.
2. That evidence in this matter was derived from an unlawful search of the Defendant's person and vehicles. Additionally, a statement was taken from the Defendant during a period of unlawful detention and without proper advisement and waiver of the Defendant's Miranda rights. Finally, any statement taken from the Defendant was constitutionally involuntary
3. The Defendant respectfully requests an evidentiary hearing in this matter at which the government should be required to meet its burden of establishing the lawfulness of any search and seizure and lawfulness of the taking of any statement from the Defendant.
4. And for such additional reasons as may be set forth at a hearing in this matter.

WHEREFORE it is respectfully requested that this Honorable Court grant the relief prayed.

Respectfully submitted,

MarcusBonsib, LLC

/S/

ROBERT C. BONSIB
6411 Ivy Lane, Suite 116
Greenbelt, Maryland 20770
(301) 441-3000
Bar No. 00324

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the Motion to Suppress was sent via ECF this 25th day of August, 2014 via ECF to Assistant United States Attorney James Warwick Office of the United States Attorney for the District of Maryland, 36 S. Charles Street, 4th Floor, Baltimore, MD 21201.

/S/

ROBERT C. BONSIB